

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Case No. 23-mc-_____

Plaintiff,

v.

**STIPULATION TO EXTEND
TIME TO COMMENCE
JUDICIAL FORFEITURE
PROCEEDINGS**

\$19,000 IN U.S. CURRENCY,

Defendant,

and

DAMONTAE SIMMONS,

Claimant.

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until September 18, 2023.

1. On or about March 28, 2023, the Minneapolis/St. Paul International Airport Police (“APD”) and members of the United States Drug Enforcement Administration (“DEA”) seized \$19,000 in U.S. Currency from the Claimant.

2. The DEA commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On May 23, 2023, Damontae Simmons filed a claim for the Defendant Currency through his attorney, Connor Cremens.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the

currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until September 18, 2023 in order to allow time for settlement discussions.

Dated: August 18, 2023

ANDREW M. LUGER
United States Attorney

s/ Craig Baune

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Date: August 18, 2023

KOWITZ LAW

s/ C. Conner Cremens

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Damontae Simmons